RECEIVED & INSPECTED

MAR 2 9 2005

FCC - MAILROOM

verizon

EX PARTE OR LATE FILED

500 Westchester Avenue White Plains, NY 10604

Phone 914-644-2214 Fax 914-644-2260 stuart.d.elby@verizon.com

04-36

March 23, 2005

Stuart Elby

ORIGINAL

VIA REGULAR U.S. MAIL AND FACSIMILE (732-287-0396)

Mr. Jeffrey Citron Chairman and CEO Vonage Holdings Corporation 2147 Route 27 Edison, NJ 08817

VP - Network Architecture & Enterprise Tech

Verizon Technology Organization

Dear Mr. Citron:

I am writing on behalf of Ivan Seidenberg to respond to your recent letter regarding the importance of E911 functionality for VoIP users. We will continue to work with you to achieve viable, secure solutions to provide Voice over Internet Protocol (VoIP) customers with E911 service.

Verizon is working with Vonage and other key industry players in the relevant industry bodies to ensure that citizens who use VoIP receive reliable and robust E911 services. The National Emergency Number Association (NENA) is hosting a forum (NENA Next Gen) whose goal is to define standards for a next-generation E911 system that would fully integrate wireline, wireless, and IP platforms on a nationwide basis. Verizon is an active participant in that forum. The Network Reliability & Interoperability Council (NRIC) also is studying the issue of E911 and VoIP. Here too, Verizon is actively involved. Furthermore, Verizon is a member of the E911 Institute which supports the E911 Caucus, a group of Senators and Representatives dedicated to improving public safety by creating a national focus on E911 issues and their solutions. Enhancing public safety through secure and reliable E911 networks has been and remains a primary focus for Verizon.

Verizon believes a timely solution to the VoIP E911 dilemma is a public safety imperative and is committed to delivering interim solutions which meet the needs of the VoIP and the first responder communities and also safeguard the integrity and security of the E911 system. Therefore, any E911 solution for VoIP must provide for the public safety through a secure E911

No. of Copies rec'd ______ List ABCDE

¹ We have significant concerns with the Rhode Island E911 solution that you mention in your letter. The Rhode Island model potentially exposes the PSAP to security vulnerabilities (e.g., denial of service attacks) that may overwhelm PSAP operations. Moreover, since VoIP calls reach the PSAP through the ordinary public switched telephone network (PSTN) and not over dedicated trunks, 911 calls are not prioritized over any other type of PSTN calling. Thus a VoIP 911 caller may not reach the PSAP during a high volume calling period. Verizon believes, however, that workable solutions can and will be found.

network. This is of paramount importance in a world where dependable access to first responders is critical. Verizon will continue to work diligently with the PSAP community, VoIP providers, their vendors, regulatory bodies and VoIP customers to arrive at a workable and replicable model for VoIP E911.

Verizon encourages Vonage to share any specific recommendations with Verizon's Executive Director for Federal Regulatory Affairs, Michael O'Connor on 212-395-2976. Verizon welcomes the opportunity to continue to work with Vonage to further enhance the safety and security of our citizenry.

Sincerely,

Stuart D. Elby Vice President

Verizon Technology Organization

cc:

Kevin J. Martin, Chairman, FCC

Kathleen Q. Abernathy, FCC Commissioner

Michael J. Copps, FCC Commissioner

Jonathan S. Adelstein, FCC Commissioner

Gregory S. Ballentine, President, APCO International

William M. Flynn, Chairman, State of New York, Public Service Commission

Connie Hughes, Commissioner, New Jersey Board of Public Utilities

The Honorable Mike Ferguson,

The Honorable Hillary Rodham Clinton

The Honorable Charles E. Schumer

The Honorable Frank Lautenberg

The Honorable Jon Corzine

The Honorable John Shimkus

The Honorable Anna Eshoo

The Honorable Conrad Burns

Jeanne M. Fox, Chairman, New Jersey Board of Public Utilities

Charles Dowd - Deputy Inspector, New York Police Department

Gino Mencini, Commissioner, New York City, DoITT

Lawrence T. Babbio, Vice Chairman and President, Verizon Communications

Ivan G. Seidenberg, Chairman and CEO, Verizon Communications